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18 Attorneys for Plaintiff
19 **CYNTHIA RICKS**

20 UNITED STATES DISTRICT COURT

21 DISTRICT OF NEVADA

22 13 **CYNTHIA RICKS**, an individual,

23 Case No. 2:20-cv-01359-KJD-(VCF)

24 Plaintiff,

25 THE PARTIES STIPULATION and
26 (PROPOSED) ORDER
27 TO EXTEND THE DEADLINE FOR THE
28 PROPOSED STIPULATED DISCOVERY
29 PLAN and SCHEDULING ORDER
(Fed. R. Civ. P. 26(f) and LR 26-1(e))

30 16 **SUN LIFE ASSURANCE COMPANY OF**
31 **CANADA**, a foreign corporation, doing
32 business as **SUN LIFE FINANCIAL**,

33 18 Defendant.

34 19
35 20 Plaintiff, **CYNTHIA RICKS**, by her counsel, Steven J. Parsons of **LAW OFFICES OF STEVEN**
36 **J. PARSONS** and Defendant, **SUN LIFE ASSURANCE COMPANY OF CANADA**, by its counsel,
37 Kristina N. Holmstrom of **OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.** hereby stipulate to
38 jointly request that the parties be given additional time within which to propose a Discovery
39 Plan and Scheduling Order (“DPSO”).

40 25 The parties have met and conferred and respectfully represent that:

41 26 1. Defendant has agreed to produce to Plaintiff the “claim file” Defendant created
42 in administering Plaintiff’s claim. Defendant represents that it will have the claim file to

1 Plaintiff not later than Thursday, October 22, 2020;

2 2. Plaintiff will forthwith review and assess the claims file. Plaintiff has alleged a
3 claim for disability benefits within a non-ERISA preempted plan, and claims handling torts have
4 also been alleged. Plaintiff seeks to understand the conduct of Defendant before committing
5 to a DPSO.

6 3. A proposed DPSO will then be lodged with the Court not later than Thursday,
7 November 5, 2020. In the event the parties are not able to agree on a proposed DPSO, the
8 parties will each file her and its proposed DPSO.

9 Dated: October 8, 2020.

10 LAW OFFICES OF STEVEN J. PARSONS

OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.

11 /s/ Steven J. Parsons
12 STEVEN J. PARSONS
13 Nevada Bar No. 363

/s/ Kristina Holmstrom
KRISTINA HOLMSTROM
Nevada Bar No. 10086

13 Attorney for Plaintiff
CYNTHIA RICKS

Attorneys for Defendant
SUN LIFE ASSURANCE COMPANY OF CANADA

ORDER

IT IS SO ORDERED.

17 Dated: 10-9-2020

U.S. MAGISTRATE JUDGE

